

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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IN RE: AUTOMOTIVE PARTS )  
ANTITRUST LITIGATION )  
\_\_\_\_\_  
IN RE: ALL AUTO PARTS )  
CASES )  
\_\_\_\_\_  
THIS DOCUMENT RELATES )  
TO ALL ACTIONS )  
\_\_\_\_\_  
)

) Master File No. 12-md-02311  
Honorable Marianne O. Battani  
Special Master Gene J. Esshaki  
)  
2:12-MD-02311-MOB-MKM  
)

**NON-PARTY KIA MOTORS MANUFACTURING GEORGIA, INC.'S  
NOTICE OF FILING UNDER SEAL ITS SEPARATELY FILED REPLY  
TO THE PARTIES' RESPONSE TO THE TO SPECIAL MASTER'S APRIL  
20, 2016 ORDER REGARDING 30(b)(6) DEPOSITIONS**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In Re: AUTOMOTIVE PARTS ANTITRUST LITIGATION	)	Master File No. 12-md-02311 Honorable Marianne O. Battani Special Master Gene J. Esshaki
In Re: All Auto Parts Cases	)	
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NOTICE OF FILING UNDER SEAL ITS SEPARATELY FILED REPLY  
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Non-Party Kia Motors Manufacturing Georgia, Inc. (KMMG), pursuant to the Stipulation and Protective Order Governing the Production and Exchange of Confidential Information (the Protective Order) [Dkt. No. 200], hereby provides notice of filing under seal its Separately Filed Reply to the Parties' Response to Objections to Special Master's April 20, 2016 Order Regarding 30(b)(6) Depositions (the Reply), including the exhibit attached thereto. The Reply cites to information contained in a declaration from a KMMG employee that includes KMMG's confidential and proprietary business information. Paragraph 19 of the Protective Order provides that "this Order shall serve as a stipulated order for purposes of Civil Local Rule 5.3(b)" and requires all materials containing "Confidential Information or Highly Confidential Information" (as defined in the Protective Order) to be filed under seal, in accordance with the procedures contained in the Protective Order. No means other than sealing will preserve the confidentiality of the confidential information contained in the Reply.

This the 23<sup>rd</sup> day of May, 2016.

/s/ Meredith Jones Kingsley

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 23, 2016, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notifications of such filing to all counsel of record.

/s/ Elliot H. Scherker

Elliot H. Scherker